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7 **IN THE UNITED STATES DISTRICT COURT FOR**  
8 **THE WESTERN DISTRICT OF WASHINGTON**  
9 **AT SEATTLE**

10 RAQUEL MARTINEZ DIAZ and  
11 VIACHESLAV POLIAKOV,

12 Plaintiffs,

13 v.

14 UNITED STATES IMMIGRATION AND  
15 CUSTOMS ENFORCEMENT,  
16 RONALD D. VITIELLO, Deputy  
17 Director and Acting Director of U.S.  
18 Immigration and Customs  
19 Enforcement, UNITED STATES  
20 DEPARTMENT OF HOMELAND  
21 SECURITY, KIRSTJEN NIELSEN,  
22 Secretary of Homeland Security; and  
23 CYNTHIA MUNITA, Director of the  
Seattle Field Office of U.S. Immigration  
and Customs Enforcement, BRYAN  
WILCOX, Deputy Field Office Director  
for the Seattle Field Office of ICE,  
WILLIAM PANALOZA, Assistant Field  
Office Director for Detention in the  
Seattle Field Office of ICE,

Defendants.

NO.

DECLARATION OF RACHEL  
MARTINEZ DIAZ

Declaration of Raquel Martinez Diaz

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1 I, Raquel Martinez Diaz, declare as follows,

2 1. I am a citizen of Mexico. I am currently detained at the Northwest  
3 Detention Center in Tacoma, Washington. The Northwest Detention Center is  
4 run by a company called GEO. I have been in this detention center since on or  
5 around August 23, 2018. During this time, I have been in Cell Block Number D-2  
6 with approximately 32 other women.  
7

8 2. Before August 30, 2018, I heard from another person there was a  
9 hunger strike happening. I heard other people here and in other detention  
10 centers were doing a hunger strike because they wanted detention centers to be  
11 closed. I realized if there were no detention centers, ICE would not grab people  
12 and jail them here. I thought, I want to support them in this. I began speaking  
13 to other women in my cell block about supporting the other Latinos in their  
14 hunger strike.  
15

16 3. Beginning on the morning of August 30, 2018, I stopped eating. Since  
17 that time, I have eaten just one slice of bread and I've taken my medication for  
18 backpain. That morning, the guards at the food cart noticed I did not take my  
19 food tray. They asked me if I would eat, and I said no thank you. The guard  
20 asked me my name and A number and made a note. Then, the guard gave the  
21 food on my tray to other people. I have never seen the guards give extra food to  
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1 people before—they are usually very strict that each person only gets the food  
2 on their tray. Usually, if there is any food left over on the cart, the guards will  
3 bring it back to the kitchen.

4 4. On or around September 2 or 3, 2018, ten other women in my cell  
5 block also decided to begin a hunger strike. We are separated from our children,  
6 who are being unjustly punished for our actions. The ten other women and I  
7 would please like GEO, ICE, and people outside to give us a chance to live legally  
8 in this country and prove that we can be good citizens, integrated in society. We  
9 are very afraid of being deported to the violence of our countries, where we fear  
10 being killed and we fear our children will be victims of violence. We hope the  
11 hunger strike will please help us get reunited with our children, be given our  
12 freedom, and to please be given the chance to live safely in this country. If this  
13 were possible, we would be very grateful.

14 5. On or around September 2 or 3, 2018, a guard noticed many of us  
15 refusing our food, and said to the whole block in English saying basically, "if you  
16 go on a hunger strike, you will not gain anything. I've seen other people do  
17 hunger strikes and nothing happens. You will get sick. We will take you to  
18 solitary confinement and we will take you to a judge who will order you to be  
19 force fed you through a tube in your nose. Those of you who are going to stop  
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1 eating, just stop eating. Don't tell other people to stop eating." I heard the guard  
2 say the English word "writeup," but I'm not sure if she was talking about what  
3 would happen if we did a hunger strike or if it was for encouraging others to  
4 join.

5 6. A "writeup" means that you're causing problems. It goes into your file,  
6 and I understand it goes to the director. It can cause problems with my  
7 immigration case.

9 7. After the guard said that, most of the other women who had decided  
10 to do the hunger strike took food and started eating. Just three of us decided not  
11 to eat. One woman began fasting, and another woman who has health concerns,  
12 decided to only eat the final meal each day.

14 8. The guards are no longer writing down my name and number when I  
15 do not eat. They are not distributing my food amongst the others.

16 9. I still believe the demands of the women in this cell block are worth  
17 bringing to public attention, which we can best do and express by joining  
18 together in the hunger strike. What the guard told all of us on or around  
19 September 2 or 3, 2018 caused most of the other women to fear continuing with  
20 the hunger strike. I respectfully request the assistance of the court so that we  
21 can continue in this protest.  
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1           10. I am over the age of 18, have personal knowledge of the matters  
2 herein and am competent to testify in this case. I declare under penalty of  
3 perjury of the laws of the United States of America and the State of Washington  
4 that the foregoing is true and correct.  
5

6           EXECUTED this 8 day of September, 2018, at Tacoma, WA.  
7

8           Raquel Martinez  
9           Raquel Martinez Diaz  
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